

EXHIBIT 21

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF
DELAWARE; STATE OF CALIFORNIA; STATE
OF COLORADO; STATE OF ARIZONA; STATE
OF CONNECTICUT; DISTRICT OF COLUMBIA,
STATE OF HAWAI'I; STATE OF ILLINOIS;
OFFICE OF THE GOVERNOR *ex rel.* Andy
Beshear, in his official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE OF
MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE OF
MICHIGAN; STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF NORTH CAROLINA; STATE OF OREGON;
JOSH SHAPIRO, in his official capacity as
Governor of the COMMONWEALTH OF
PENNSYLVANIA; STATE OF RHODE ISLAND;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as
AmeriCorps; and JENNIFER BASTRESS
TAHMASEBI, in her official capacity as Interim
Head of the Corporation for National and
Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

DECLARATION OF RACHEL TEMBY

Pursuant to 28 U.S.C. § 1746, I, Rachel Temby, hereby declare as follows:

1. I am a resident of the State of Maryland. I am over the age of 18 and have personal knowledge of all the facts stated herein, including as based on my experience and information

provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the Maryland Park Service as Deputy Director.

3. The Maryland Park Service, a component of the Maryland Department of Natural Resources (DNR), is responsible for operating the State park system and all associated programs.

4. As Deputy Director of the Maryland Park Service, I directly oversee the administration and operation of all conservation corps programs, including the Maryland Conservation Corps (MCC), an AmeriCorps program.

5. MCC was established in 1984 by DNR as a specialized program to provide education and employment opportunities for young people and to support the restoration of the Chesapeake Bay and public lands. Modeled after the Civilian Conservation Corps from the New Deal era, MCC mobilizes young adults in intensive environmental conservation efforts that preserve, protect, enhance, and restore Maryland's natural resources.

6. MCC members provide critical support to Maryland's parks as a cost-effective, well-trained, highly motivated, and flexible workforce. MCC service members can travel from park to park to assist with large projects or respond to disasters without reducing the operational capabilities of their home parks.

7. In the 2023–24 service year, for example, MCC members improved thousands of acres of public lands; restored hundreds of miles of trails and waterways across Maryland; provided environmental education programs to more than 28,000 students, youth, and park visitors; and helped respond to wildfires and clean up park facilities and trails after major storms.

8. Over MCC's 41 years of existence, more than 8,000 participants have improved over 19,000 miles of trails and waterway corridors; maintained over 420,000 acres of public lands;

planted more than 790,000 trees, native plants, and bay grasses; led more than 3,900 youth in park projects; and taught over 1,290,000 students and park patrons about the environment.

9. MCC has been supported by AmeriCorps for the past two decades. Since 2004, MCC has received nearly \$10 million in competitive and formula AmeriCorps grants and has enlisted 1,107 AmeriCorps members in service to the State of Maryland.

10. The details of MCC's funding since 2004 are as follows:

Year	# of AmeriCorps Members	AmeriCorps Funds	State Matching Funds	Total Program Cost
2004	10	\$127,949.00	\$221,425.00	\$349,374.00
2005	28	\$252,718.00	\$496,684.00	\$749,402.00
2006	41	\$261,900.00	\$692,901.00	\$954,801.00
2007	41	\$508,998.00	\$658,415.00	\$1,167,413.00
2008	39	\$489,561.00	\$597,888.00	\$1,087,449.00
2009	39	\$486,141.00	\$673,699.00	\$1,159,840.00
2010	62	\$681,804.00	\$945,748.00	\$1,627,552.00
2011	62	\$692,333.00	\$956,987.00	\$1,649,320.00
2012	62	\$686,222.00	\$955,652.00	\$1,641,874.00
2013	30	\$310,298.00	\$968,428.00	\$1,278,726.00
2014	35	\$308,655.00	\$917,470.00	\$1,226,125.00
2015	35	\$308,655.00	\$1,064,956.00	\$1,373,611.00
2016	35	\$325,463.00	\$1,091,960.00	\$1,417,603.00
2017	35	\$325,463.00	\$1,136,578.00	\$1,462,041.00
2018	35	\$325,463.00	\$1,149,264.00	\$1,474,727.00
2019	35	\$464,565.00	\$1,090,573.00	\$1,555,138.00
2020	35	\$450,612.00	\$1,244,185.00	\$1,694,797.00
2021	42	\$590,532.00	\$1,337,631.00	\$1,928,163.00
2022	42	\$590,532.00	\$1,360,154.00	\$1,950,686.00
2023	42	\$590,532.00	\$1,364,696.00	\$1,955,228.00
2024	42	\$922,079.00	\$1,684,470.00	\$2,606,549.00
Total	827	\$9,700,655.00	\$20,609,764.00	\$30,310,419.00

11. On April 15, 2025, I learned from MCC staff that all members of AmeriCorps' National Civilian Community Corps (NCCC) program had been placed on administrative hold status effective immediately, and would be exited early with "Compelling Personal Circumstances

(CPC)” status after April 30. The stated reason was: “In alignment with the Trump-Vance administration priorities and Executive Order 14222 ‘Implementing the President’s “Department of Government Efficiency” Cost Efficiency Initiative,’ AmeriCorps NCCC is working within new operational parameters that impact the program’s ability to sustain program operations.”

12. The next day, I learned from MCC staff that a substantial proportion of AmeriCorps staff were also placed on administrative leave, leaving only a small crew left in each department. A subsequent update from the Corps Network reported that “some 85% of Ameri[C]orps federal staff members have been put on paid administrative leave” and “the agency is operating with only about 100 employees.” A true and exact copy of the email from the Corps Network is attached as Exhibit A.

13. The affected staff included those responsible for administering funds for state-operated programs such as MCC.

14. On the evening of Friday, April 25, I learned from news reports that “Elon Musk’s U.S. DOGE Service ha[d] ordered AmeriCorps to terminate close to \$400 million in grants—roughly 41 percent of the national service agency’s total grant funding.”¹

15. Later that evening, I heard from DNR colleagues that several AmeriCorps programs in Maryland—including HabiCorps and Civic Works—had been notified that their current program year funding was cut and that their members needed to stop service immediately.

16. The next morning, the Secretary of DNR spoke to the Governor’s Office and discovered that MCC had been eliminated as well. He informed our team that all reimbursements

¹ Tobi Raji, *DOGE orders major cut to AmeriCorps funding, imperiling agency’s work*, Wash. Post, Apr. 25, 2025, <https://www.washingtonpost.com/nation/2025/04/25/ameri-corps-grant-cuts-doge/>.

would cease and MCC could no longer expense from the grant. I then notified MCC leadership to stop work.

17. As of April 25, 2025, for the current fiscal year ending July 1, MCC had yet to draw down over \$386,284.00 in federal funds.

18. Prior to April 26, AmeriCorps supported 41 full-time service members who served in state parks across Maryland. Those service members were eligible to receive:

- a. A bi-weekly living allowance;
- b. Health care benefits;
- c. Child care assistance (if applicable);
- d. An AmeriCorps Education Award, which could be used toward school tuition, most federally approved student loans, or future education costs for up to seven years; and
- e. Low-cost park housing (if available).

19. Those service members have now been told to stop work and many of their benefits have been halted.

20. MCC received an email from the GOSV, forwarded from Jennifer Bastress Tahmasebi, Interim Agency Head of AmeriCorps. The email said, in part: “Dear AmeriCorps Award Recipient: Effective immediately, the AmeriCorps award subrecipient(s) included in the attached spreadsheet is/are being terminated per 2 CFR 200.340(a)(4) because it has been determined that the award no longer effectuates agency priorities.”

21. Absent AmeriCorps funding, DNR will struggle to find resources to offer comparable benefits to full-time service members now and in future years. The suspension of service members’ benefits already has led to stop-work orders and will prevent some or all of

MCC's current 41 AmeriCorps service members from continuing to serve or completing their service terms. The result will be as many as 71,400 service hours lost annually in environmental and park infrastructure restoration, trail and waterway improvement, and environmental education and interpretation on an annual basis.

22. MCC had received AmeriCorps funding for more than 20 years and DNR intended to apply for a grant to continue to operate the program for the coming fiscal year. Because the current grant was cancelled with no notice and minimal explanation, I have no confidence that MCC will be approved for funding as it routinely has been for the past two decades.

23. In addition, because so many AmeriCorps staff have been placed on leave or terminated, I do not know whom to contact regarding this cancellation and do not believe that the agency will be able to review grant applications for the next fiscal year in a timely manner.

24. Without clarity as to why the current grant was terminated or when grants for next year will be awarded, DNR does not know how much money will need to be replaced and cannot readily identify substitute funds that might allow us to continue to operate MCC at a reduced level.

25. Along with the abrupt demobilization and revocation of awarded funds for other AmeriCorps programs in recent weeks, the sudden cancellation of this grant with no notice over a weekend is deeply discouraging and will doubtless have a chilling effect on potential volunteers at Maryland parks and future potential service corps members.

26. The support that MCC members provide to Maryland's parks is critical and irreplaceable. In particular, MCC can deploy service members on specialized or emergency projects across the state so that DNR does not need to reassign permanent staff from their duty stations. The loss of the MCC program due to AmeriCorps' effective closure will be keenly felt.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on May 6, 2025, at Annapolis, Maryland.



RACHEL TEMBY

EXHIBIT A

----- Forwarded message -----

From: **The Corps Network** <htraverse@corpsnetwork.org>

Date: Thu, Apr 17, 2025 at 5:14 PM

Subject: The Crewleader

To: <john.ford@maryland.gov>

Please encourage your community and supporters to contact Congress and show support for AmeriCorps. We need everyone to call. Now is not the time to sit on the sidelines!

[View this email in your browser](#)



Take Action to Protect AmeriCorps

Now is not the time to sit on the sidelines - we need you now! Please contact Congress. Encourage your board members, partners, and alums to call Congress, too.

Dear Corps,

The Department of Government Efficiency (DOGE) recently arrived at AmeriCorps. As many of you have likely heard, there have [already been drastic downsizing actions](#).

AmeriCorps NCCC and FEMA Corps effectively ceased operations this week. Additionally, some 85% of AmeriCorps federal staff members have been put on paid administrative leave. We are told the agency is now operating with only about 100 employees, hobbling their ability to carry out important functions. There is deep concern about the possibility of further cuts.

The Corps Network is joining our partners at Voices for National Service in calling on you to please contact Congress. It's imperative that you also activate your board members, alums, partners, and other supporters to get involved. **We urgently need as many voices as possible reaching out to members of Congress and sending a strong message about the need to protect AmeriCorps funding.** We hope to flood offices with calls in support of AmeriCorps over the next few days – time is of the essence!

Please avoid criticism of the administration and lean into the positive and powerful impact of AmeriCorps and how it supports the important work of local organizations like yours.

**Call Your Members of Congress.
Show your support for AmeriCorps.**

- [Find contact information for Congressional offices](#)
- See here for call instructions and [a script for your general community of supporters](#)
- See here for call instructions and a [script to share with your board members or other "grasstops" champions](#)
- [Send an email](#)